



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

July 15, 2013

Kate Klein, Forest Supervisor
Ochoco National Forest
3160 NE Third Street
Prineville, Oregon 97754

Re: EPA Region 10 comments on the McKay Fuels and Vegetation Management Project FEIS, EPA
Project number 12-4150-AFS.

Dear Ms. Klein:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement (FEIS) for the proposed McKay Fuels and Vegetation Management Project on the Lookout Mountain Ranger District of the Ochoco National Forest in Crook County, Oregon. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The FEIS analyzes the Forest Service's proposal to strategically reduce forest vegetation density and fuel loadings; increase or maintain large tree structure and hardwood abundance and diversity in riparian habitat conservation areas; and contribute to local and regional economies. Proposed project components include commercial and pre-commercial thinning, juniper removal, mistletoe reduction, controlled burning, and riparian harvest to benefit hardwood species. The project units would be located within a 25,526-acre project area. The FEIS analyzes a no action alternative and three action alternatives. In the Draft EIS, Alternative 3 was identified as the preferred alternative. Alternative 3 remains the preferred alternative in the Final EIS. Key features of the preferred alternative are the proposed treatment of additional acres through commercial thinning and the inclusion of additional riparian treatments. It would also improve floodplain connectivity in two locations.

In our April 2013 comments on the DEIS, we recognized the Forest's efforts related to riparian management planning. In the DEIS, the Forest conducted site-specific analyses of the riparian stands selected for treatment, and described treatments on a unit-by-unit basis (Tables 1 and 2). While supporting this approach, we recommended that the FEIS include clarifications related to the modeling approach utilized in the DEIS (Netmap Thermal Load Modeling). We also requested clarification of treatment objectives in riparian zones outside of 125 feet. Finally, we recommended the inclusion of a comparison of alternatives in table format.

We appreciate the Forest's responsiveness to our comments. Appendix C provides helpful clarification on the Netmap Thermal Load Modeling procedure and assumptions. The response to comments also provides useful context and helpful clarification about the broader riparian management approach in the document. We also appreciate the inclusion of table 14 (Comparison of Alternatives). The table was a helpful addition for our final review.

Overall, the EPA continues to support the objectives of the McKay Project, especially promoting the development of large trees and old structure forest; promoting the development of stream shading where temperatures are too high; restoring and enhancing hardwood stands as appropriate; and reducing the risk of disturbance events (insect, disease, wildfire) leading to a loss of desired forest conditions.

We appreciate the opportunity to review and comment on the FEIS. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at reichgott.christine@epa.gov. Or you may contact Teresa Kubo of my staff at (503) 326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit